I.3
11/30/99

POLLUTION REPORT

I. HEADING

Date: January 13, 1999

Subject: Midwest Body Corporation Site, Paris, Edgar County, Illinois

From: Kevin Turner, U.S. EPA On-Scene Coordinator, Region 5

To: K. Mould, U.S. EPA, OSWER, Washington, DC
R. Karl, Chief, Emergency Response Branch
B. Bolen, Chief, Emergency Response Section II
B. Messenger, Chief, Emergency Enforcement Section
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H. Taylor, Chief, Paris Fire Department

POLREP: #3 - Final (Fund Lead Removal)

II. BACKGROUND

Site No: B530
CERCLIS No: ILD005157888
NPL Status: Non NPL
Start Date: 09/29/98
Completion Date: N/A

Task Order No: 006
Response Authority: CERCLA
State Notification: 06/27/97
Demobilization Date: 11/13/98
Status of Action Memorandum: Signed 04/09/98

III. SITE DESCRIPTION

A. Incident Category: Inactive Manufacturing Facility

B. Site Location: 2109 South Central Ave
Paris, IL 61944

Site Latitude: 39° 35' 37.6" Site Longitude: 87° 41' 55.2"

1. Site description:

The original 22.3 acre site consists of a 274,000-square-foot abandoned building, two small pump houses, several above ground storage tanks, and a water tower. The site is situated in a light industrial and residential area. Farmland borders the site to the southwest, Cadillac

Products Inc. lies to the southeast; Central Avenue, Bell & Bell Demolition Co., and Moss Grain Co. lie to the east; an alley and residential homes are north of the site; and Foley Lumber borders the site to the west. An active railroad spur enters the property and services two neighboring businesses. There is a fence around the property; however where the railroad spur enters there is unrestricted access. Through a Brownfields renovation agreement with the U.S. EPA, Illinois EPA (IEPA), the City of Paris, and the Robert Morgan Company, the property was divided into two distinct sections. The section west of the Manufacturing building, which is the open field is the area of concern. The other area will be maintained by the Robert Morgan Company.

Midwest Body Corporation began operations in 1908, manufacturing street sweepers and street cars. After World War II, the company produced specialized truck bodies. Production ceased and the plant closed in July 1993. The operations generated the following waste streams; hazardous paint waste (enamel paint residues mixed with xylenes); non-hazardous paint sludges (from water-based paints); used paint booth air filters; water-soluble parts washer rinse waters; welding cooler water; and waste oil (from equipment maintenance). In addition there is one underground storage tank and three aboveground storage tanks.

2. Description of threat:

Hazardous substances found at the site include waste paint containing lead, barium, cadmium, chromium, toluene, ethylbenzene, and xylene. The high concentrations of VOC's are hazardous wastes under 40 CFR 261.33 and are hazardous substances under section 101(14) of CERCLA. Soil samples confirmed that material on site is a hazardous waste under RCRA due to a TCLP lead concentration of 5.7 ppm. IEPA also documented that groundwater contamination has already occurred on site. IEPA has documented at least seven separate locations where buried paint waste or drums and containers were located. U.S. EPA START samples and IEPA samples confirmed that this paint waste contained elevated levels of lead, barium, cadmium, chromium, toluene, ethylbenzene, and xylene. Weather conditions on site (freeze, thaw, rain, and snowmelt) may cause further deterioration of the drums, which could result in additional releases.

C. Preliminary Assessment/Site Inspection Results

An environmental site investigation was conducted by Graef, Anhalt, Schloemer, & Associated (GAS) from July through October 1996. GAS used geophysical electromagnetic surveys to locate possible locations of tanks, drums, and buried utility lines, installed four monitoring wells and three well nests and sampled them to detect groundwater contamination, sampled soil, and excavated 135 test pits to look for drums, paint waste, or other evidence of contamination. Paint waste was found in five discrete areas at depths of up to eight feet. Drum burial and paint container burial pits were found in two locations. Analytical results detected elevated levels of lead, barium, and SVOC's. GAS estimated that 1,000 to 2,000 cubic yards of paint waste were located in test pit areas.

IV. RESPONSE INFORMATION

A. Situation

1. Removal activities to date:

Earth Tech (as the ERRS contractor) excavated contaminated material from the site. The excavation pits are larger than or roughly match Illinois EPA's delineation as detailed in their Remedial Investigation (RI) report. Additional areas of contamination not identified in the RI report were discovered through a discussion with a local resident. Approximately 80 test pits have been dug outside of the excavated pits to verify the extent of contamination. The test pits were dug between 6 and 12 feet deep depending on the depth of the clay layer. Analytical results received indicate that clean-up criteria for total lead concentration of 400ppm and/or TCLP lead concentration of 5ppm has been met within the excavation pits. Earth Tech backfilled excavation pits with approximately 3,500 tons of clean material located on site. An additional 1186.25 tons of backfill material was procured from Kuhn Trucking Services, Marshall IL.

Before off site transportation began the pile of contaminated material was approximately 3,500 cubic yards. Shipment of contaminated material started on October 28, and finished on November 6. Earth Tech, USEPA, and START determined the designation of hazardous and nonhazardous rail cars and manifested them accordingly. The disposal facility, USL City Environmental, Detroit, MI accepted the waste based upon waste profiles. They may analyze the contents of a rail car to ensure that cars identified as nonhazardous are nonhazardous. Twelve rail cars were delivered every 48 hours (3 times a work week). Earth Tech lined and loaded the cars in order for them to be shipped on the day new rail cars arrived. Twenty seven hazardous cars were shipped as nonhazardous and fifteen were shipped as hazardous; each car contained an estimated 95 tons of material (2,565 tons nonhazardous and 1,615 tons hazardous). Earth Tech removed the ramp that was used to load rail cars. Earth Tech also scraped between six inches to a foot of soil from the area where the contaminated material was staged. The three above ground storage tanks (AST's) were sampled, and the liquid was visually inspected. The AST's will remain on site.

Weather conditions on site have varied from the low 30's to mid 50's degrees Fahrenheit, the winds were predominantly from the north and north-west. Two rain events occurred which have left the site wet and muddy. The rain filled the excavation pits with water. On November 5, Earth Tech pumped water from the excavation pits into a drainage ditch south of the railroad tracks. The pumped water remained on the property and did not flood adjacent properties.

On November 10, OSC Turner attended a City Council meeting to discuss site activities. On November 5, START placed identical locks on the groundwater monitoring wells.

Telephone lines and electricity were disconnected. Rubber tire loader and excavator were decontaminated by Paris Fire Department and demobilized.

2. Enforcement:

In April 1995, the City of Paris served a notice of a "complaint of nuisance" against the facility. The City of Paris desires to redevelop the site, but because of allegations of buried waste and concerns to human health and environment, an investigation was conducted by the IEPA. On June 27, 1997 the IEPA requested assistance from the U.S. EPA Region V. Site activities are coordinated with state and local officials.

B. Planned Removal Actions

None expected

C. Next Steps

None expected

D. Key Issues

None expected

V. COSTS

Extramural Costs:

Total Cleanup Contractor (e.g, ERRS) Costs	$595,000.00
START	$17,827.89
TOTAL, EXTRAMURAL COSTS	$612,827.89

Intramural Costs:

Direct Costs (Region, HQ, ERT)	$12,500
Intramural Indirect Costs	$0
TOTAL, INTRAMURAL COSTS	$12,500

TOTAL SITE COST	$625,327.89
Project Ceiling	$1,429,710
Project Funds Remaining (percentage)	**56.3%**

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor. Other financial data, which the OSC must rely upon, may not

be entirely up to date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

Wastestream	Medium	Quantity	Contaminant	On Site Treatment	Disposal
Hazardous	Soil	1,615 tons	TCLP Lead	None	City Environmental; Detroit, MI
Nonhazardous	Soil	2,565 tons	None	None	City Environmental; Detroit, MI